

# **EXHIBIT A**

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ENDORSED  
FILED  
ALAMEDA COUNTY

MAR 02 2020  
CLERK OF THE SUPERIOR COURT  
By *Jessica Morris*

7           ATTORNEYS FOR PLAINTIFFS  
8           ROHINI SUNDARAM and ANAND CHANDRAN

9           SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10          IN AND FOR THE COUNTY OF ALAMEDA

12          ROHINI SUNDARAM and ANAND  
13          CHANDRAN,

14          Plaintiff,

v.

15          WALMART, INC. and DOES 1-10, inclusive,

16          Defendants.

Case No. **RG 20056779**

**COMPLAINT FOR PERSONAL  
INJURIES**

**JURY TRIAL DEMANDED**

Unlimited Jurisdiction: Damages  
Sought Exceed \$25,000

**FAXED**

20          Plaintiffs ROHINI SUNDARAM and ANAND CHANDRAN allege the following:

21          1. Plaintiff ROHINI SUNDARAM and ANAND CHANDRAN are natural persons  
22 who are, and at all times mentioned in this complaint were, lawfully married and residing in Aliso  
23 Viejo, California.

24          2. Defendant WALMART, INC. and Does 1-5, are Arkansas Corporations, which own  
25 and operate discount and grocery stores under the names of Walmart in California.

26          3. At all times herein mentioned, Defendants and each of them were in possession of  
27 and owned and controlled the business premises known as Walmart at 15555 Hesperian  
28 Boulevard, San Leandro, California.

4. Plaintiffs are ignorant of the true names and capacities of Defendants sued herein as DOES 1-10, inclusive, and therefore sue those Defendants by such fictitious names. Plaintiffs will seek leave to amend this complaint to allege their true names and capacities when ascertained. Plaintiffs are informed and believe and thereon allege that each of the fictitiously named Defendants is negligently responsible in some manner for the occurrences alleged in the Complaint, and Plaintiff's injuries as alleged were proximately caused by said Defendants' negligence.

8       5. At all times herein mentioned, each Defendant was the agent and/or employee of  
9 every other Defendant, and in doing the things, acts, and omissions hereinafter more fully alleged,  
10 was acting within the scope and authority of said agency and employment.

## **FIRST CAUSE OF ACTION**

**(Negligence-Against All Defendants)**

13       6. On or about June 16, 2018 while Plaintiff ROHINI SUNDARAM was shopping at  
14 the above-described business premises of Defendants, Defendants so carelessly and negligently  
15 controlled, inspected and cleaned the floors of said premises so as to cause and allow an  
16 accumulation of liquid to exist on said floor, thus making the surface of the floor extremely  
17 slippery and unsafe.

18       7. The slippery and unsafe condition was known, or in the exercise of ordinary and  
19 reasonable care would have been known, to Defendants in adequate time for a reasonably prudent  
20 owner and operator of a grocery store to warn of, or make safe, the condition.

21       8.     As a proximate result of the negligence of Defendants and each of them, Plaintiff  
22 ROHINI SUNDARAM slipped and fell while walking on the floor where the liquid had  
23 accumulated, sustaining severe injuries and damages as hereinafter alleged.

24 9. As a direct and proximate result of Defendants' negligence, Plaintiff ROHINI  
25 SUNDARAM sustained injury to her body and shock and injury to her nervous system and person.  
26 Plaintiff continues to experience physical and nervous pain and suffering, to her general damage in  
27 an amount which exceeds the jurisdictional minimum of this Court. These injuries, which are the

1 direct consequences of Defendants' negligent actions, affect Plaintiff's well-being in the present,  
2 and will continue into the foreseeable future.

3           10. As a further direct and proximate result of said negligence of Defendants, and each  
4 of them, Plaintiff was required to, and did, incur medical and incidental expenses for the services  
5 of physicians to examine, treat, and care for these injuries, and will incur additional like expenses  
6 in the future, in amounts to be proved at time of trial.

7        11. As a further direct and proximate result of said negligence of Defendants, and each  
8 of them, and of the injuries caused to Plaintiff, Plaintiff has suffered a past loss of earnings and  
9 income, and will continue to lose earnings and income in the future, and Plaintiff has suffered past  
10 and future impairment of her earning capacity, in an amount to be proved at time of trial.

WHEREFORE, Plaintiff ROHINI SUNDARAM prays judgment against Defendants, and each of them, as set forth below.

## **SECOND CAUSE OF ACTION**

### **(Loss of Consortium)**

15 Plaintiff ANAND CHANDRAN complains and alleges as a first cause of action for himself  
16 against defendants WALMART, INC., and DOES 1-10, inclusive, as follows:

17 12. Plaintiff incorporates by reference paragraphs 1 to 11 above, as though fully set  
18 forth here.

19       13. Immediately before this accident, plaintiff ROHINI SUNDARAM was an adult  
20 person in good physical and mental health and was lawfully married to plaintiff ANAND  
21 CHANDRAN. Plaintiff ANAND CHANDRAN enjoyed the love, companionship, affection,  
22 society, household services, and solace of this relationship.

14. Before the injuries sustained as a result of the negligence of defendants, plaintiff  
ROHINI SUNDARAM was able to and did perform her duties as a spouse. After the injuries, and as  
a direct and legal result of them, plaintiff ROHINI SUNDARAM has been limited in performing  
these spousal duties. Plaintiff ROHINI SUNDARAM'S performance of these duties will be limited  
in the future.

28

1       15. As a direct and legal result of the aforementioned injuries suffered by plaintiff  
2 ROHINI SUNDARAM, plaintiff ANAND CHANDRAN has been deprived of the affection,  
3 companionship, society, care, comfort, protection, services, conjugal fellowship, household  
4 services, and support of his spouse. Plaintiff ANAND CHANDRAN has suffered and will suffer  
5 economic and noneconomic losses in an amount subject to proof which exceeds the minimum  
6 jurisdictional amount of this Court.

7 WHEREFORE, plaintiff ANAND CHANDRAN prays judgment as set forth below.

## PRAYER

9 WHEREFORE, plaintiffs ROHINI SUNDARAM and ANAND CHANDRAN pray for  
10 judgment as follows:

- 11        1. For general damages according to proof;  
12        2. For medical and related expenses according to proof;  
13        3. For loss of earnings according to proof;  
14        4. For costs of suit herein incurred; and  
15        5. For other such and future relief as the Court may deem proper.

17 | DATED: March 2, 2020

ROUDA, FEDER, TIETJEN, and McGUINN

By: Timothy G. Tietjen  
Robert Igleheart  
Attorneys for Plaintiffs